

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BANCO POPULAR DOMINICANO, C. Por A.

Plaintiff and Counterclaim Defendant,

vs.

LEVI STRAUSS & CO.,

Defendant and Third Party Plaintiff,

vs.

**INTERAMERICANA APPAREL COMPANY, INC.;
INTERAMERICANA PRODUCTS
INTERNATIONAL, S.A.; QST DOMINICANA
LLC; US PAPER & CHEMICAL; APPAREL
MACHINERY & SUPPLY CO.; YKK SNAP
FASTENERS AMERICA, INC.; SOUTHERN
TEXTILE DOMINICANA, INC; INDUSTRIA
CARTONERA DOMINICANA, S.A. (Smurfit);
THE GRAPHIC LABEL GROUP DOMINICANA,
INC.; and TAG-IT PACIFIC, INC.,**

Third-Party Defendants.

07 Civ. 6443 (LTS)(THK)

**NOTICE OF MOTION FOR
THE *PRO HAC VICE*
ADMISSION OF MICHAEL M.
EIDELMAN AND RANDALL M.
LENDING**

**FILED
U.S. DISTRICT COURT
2007 OCT 19 PM 1:25
S.D. OF N.Y.**

PLEASE TAKE NOTICE that upon the annexed Affidavit of Charles Caranicas in support of this motion and the certificates of good standing annexed thereto, third party defendant QST Dominicana LLC ("QST"), by its attorneys, Vedder, Price, Kaufman & Kammholz, P.C., will move this Court before the Honorable Theodore H. Katz at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York in Courtroom 17A, at a date and time designated by the Court, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an Order allowing the admissions of Michael M. Eidelman and Randall M. Lending, each shareholders at Vedder, Price, Kaufman & Kammholz, P.C., as attorneys *pro hac vice* to argue or try this case in whole or in part as counsel or advocate.

Dated: New York, New York
October 19, 2007

Respectfully submitted,

**VEDDER, PRICE, KAUFMAN &
KAMMHOLZ, P.C.**

By: 
Charles Caranicas (CC 9244)

1633 Broadway, 47th Floor
New York, New York 10019
(212) 407-7700

Attorneys for Third Party Defendant
QST Dominicana LLC

To: Mary Ellen Shuttleworth, Esq.
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Attorneys for Third Party Defendant
Tag-It Pacific, Inc.

Cartonera Dominacana, S.A. (Smurfit)
1000 Sawgrass Corp. Pkwy, Suite 120
Sunrise, Florida 33323

Southern Textile Dominicana, Inc.
c/o Precision Custom Cutting
200 Maltese Drive
Totowa, New Jersey 07512

Apparel Machinery & Supply Co.
1836 East Ontario Street
Philadelphia, PA 19134

U.S. Paper & Chemical
206 Mohican Road
Canadensis, PA 18325

Interamericana Products Int'nat'l, S.A.
3345 N.W. 116th Street
Miami, Florida 33176

Interamericana Apparel Co., Inc.
3345 N.W. 116th Street
Miami, Florida 33176

The Graphic Label Group, Inc.
201 4th Street, Suite 207
Oakland, California 94607

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INC.; and TAG-IT PACIFIC, INC.,**

Third-Party Defendants.

07 Civ. 6443 (LTS)(THK)

**AFFIDAVIT OF CHARLES
CARANICAS IN SUPPORT OF
MOTION FOR *PRO HAC VICE*
ADMISSION OF MICHAEL M.
EIDELMAN AND RANDALL M.
LENDING**

CHARLES CARANICAS, being duly sworn, deposes and says as follows:

1. I am an associate of the law firm of Vedder, Price, Kaufman & Kammholz, P.C., 1633 Broadway, 47th Floor, New York, New York 10019, attorneys for Third Party Defendant QST Dominicana LLC ("QST") in the above-captioned action.


2. I submit this affidavit in support of QST's motion for the *pro hac vice* admission of Michael M. Eidelman, Esq. and Randall M. Lending, Esq., as an attorney for QST.

3. I am a member in good standing of the Bar of the State of New York as well as the Bars of the United States District Courts for the Southern and Eastern Districts of New York.

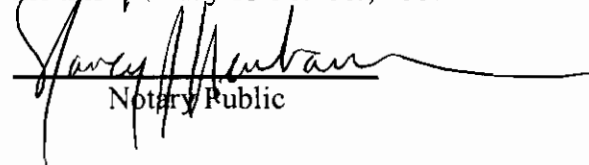
4. As shown in the annexed certificates of good standing: Michael M. Eidelman and Randall M. Lending are each members in good standing of the Bar of the State of Illinois.

WHEREFORE your affiant respectfully requests that QST's motion for the admission of Michael M. Eidelman and Randall M. Lending as attorneys *pro hac vice* be granted.

Dated: New York, New York
October 19, 2007


Charles Caranicas (CC 9244)

Sworn to and subscribed before
me this 19th day of October, 2007


Notary Public

NANCY J. NEUBAUER
Notary Public, State of New York
No. 01NE5041602
Qualified in New York County
Commission Expires April 10, 2011

CERTIFICATE OF GOOD STANDING



United States of America

}ss. Michael Marc Eidelman

Northern District of Illinois

I, Michael W. Dobbins, Clerk of the United States District Court
for the Northern District of Illinois,

DO HEREBY CERTIFY That Michael Marc Eidelman
was duly admitted to practice in said Court on (08/31/1988)
and is in good standing as a member of the bar of said court.

Dated at Chicago, Illinois
on (10/17/2007)

Michael W. Dobbins, Clerk,

By: Jannette Nuñez
Deputy Clerk

CERTIFICATE OF GOOD STANDING



United States of America

}ss. Randall Marc Lending

Northern District of Illinois

I, Michael W. Dobbins, Clerk of the United States District Court
for the Northern District of Illinois,

DO HEREBY CERTIFY That Randall Marc Lending
was duly admitted to practice in said Court on (01/11/1989)
and is in good standing as a member of the bar of said court.

Dated at Chicago, Illinois
on (10/17/2007)

Michael W. Dobbins, Clerk,

By: Jannette Nunez
Deputy Clerk

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INC.; and TAG-IT PACIFIC, INC.,**

Third-Party Defendants.

**ORDER FOR THE PRO HAC
VICE ADMISSION OF
MICHAEL M. EIDELMAN AND
RANDALL M. LENDING**

Third Party Defendant QST Dominicana LLC ("QST"), having moved pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an Order allowing the admissions of Michael M. Eidelman and Randall M. Lending, each shareholders at Vedder, Price, Kaufman & Kammholz, P.C., as attorneys *pro hac vice* to argue or try this case in whole or in part as counsel or advocate, it is ORDERED:

That the motion herein is granted, and Michael M. Eidelman, Esq. and Randall M. Lending, Esq. are hereby permitted to argue or try this case in whole or in part as counsel.

IT IS SO ORDERED.

DATED:

, 2007

Hon. Theodore H. Katz, U.S.M.J.

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THE GRAPHIC LABEL GROUP DOMINICANA,
INC.; and TAG-IT PACIFIC, INC.,**

AFFIDAVIT OF SERVICE

Third-Party Defendants.

**STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)**

SHAWN V. EVANS, being duly sworn, hereby deposes and says as follows:

1. I am not a party to this action, am over eighteen years of age, and reside in New York. **New York,**

2. On October 19, 2007, I caused the within **NOTICE OF MOTION TO ADMIT COUNSEL PRO HAC VICE; AFFIDAVIT OF CHARLES CARANICAS IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE** and proposed **ORDER** to be served on all parties by dispatching true copies of same, enclosed in a properly addressed wrapper, for delivery by regular mail, to the following addresses:

Mary Ellen Shuttleworth, Esq.
Herrick Feinstein, LLP
2 Park Avenue
New York, New York 10016
Attorneys for Plaintiffs

Gregory G. Plotko, Esq.
Cooley Godward Kronish, LLP
1141 Avenue of the Americas
New York, New York 10036
Attorneys for Defendant Levi Strauss & Co.

Howard F. Strongin, Esq.
Strongin Rothman & Abrams, LLP
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New York, New York 10004
*Attorneys for Third Party Defendant
YKK Snap Fasteners America, Inc.*

Rochelle A. Herzog, Esq.
The Gersh Law Firm
15281 Ventura Blvd., Suite 515
Encino, California 91436
*Attorneys for Third Party Defendant
Tag-It Pacific, Inc.*

Cartonera Dominacana, S.A. (Smurfit)
1000 Sawgrass Corp. Pkwy, Suite 120
Sunrise, Florida 33323

Southern Textile Dominicana, Inc.
c/o Precision Custom Cutting
200 Maltese Drive
Totowa, New Jersey 07512

Apparel Machinery & Supply Co.
1836 East Ontario Street
Philadelphia, PA 19134

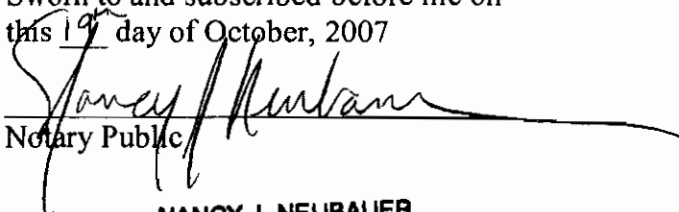
U.S. Paper & Chemical
206 Mohican Road
Canadensis, PA 18325

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3345 N.W. 116th Street
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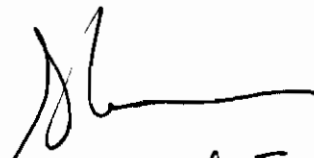
Sworn to and subscribed before me on
this 19 day of October, 2007


Notary Public

NANCY J. NEUBAUER
Notary Public, State of New York
No. 01NE5041602
Qualified in New York County
Commission Expires April 10, 2011



Charles S. Caranicas


Shawn M. Evans